

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

DOUGLAS D. HAYNES,  
Plaintiff,

-against-

LAUREN BONNER and WIGDOR LLP,  
Defendants.

Index No.:

**SUMMONS**

**TO THE ABOVE-NAMED DEFENDANTS:**

**YOU ARE HEREBY SUMMONED** to answer the Verified Complaint of the Plaintiff in this action, and serve a copy of your answer upon the undersigned attorneys for the Plaintiff within twenty (20) days after service of the above, exclusive of the date of service, or within thirty (30) days after service is complete if service is made by any method other than personal delivery to you within the State of New York. Plaintiff designates New York County as the proper venue for this action, on the basis that Wigdor LLP has its principal place of business in New York County and the conduct at issue in the Verified Complaint occurred within New York County. In case of your failure to answer, judgment will be taken against you on default for the relief demanded in the Verified Complaint.

Dated: New York, New York  
June 28, 2019

SIMON•LESSER PC

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SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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DOUGLAS D. HAYNES,	:	
Plaintiff,	:	Index No.:
	:	
-against-	:	<u>VERIFIED COMPLAINT</u>
	:	
LAUREN BONNER and WIGDOR LLP,	:	
	:	
Defendants.	:	
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Plaintiff Douglas D. Haynes, by his undersigned counsel, for his Verified Complaint against defendants Lauren Bonner and Wigdor LLP, alleges as follows:

**INTRODUCTION**

1. This is a defamation case against Lauren Bonner (the self-proclaimed face of #MeToo of Wall Street) and her media centered attorneys, Wigdor LLP (collectively, “Defendants”). In their quest to garner media attention and gain notoriety for their assertions against Ms. Bonner’s employer, Point72 Asset Management, L.P. (“Point72”), Defendants engaged in a media blitz of story-telling and lies. Caught in the cross-hairs was Point72’s former President, Douglas D. Haynes -- a distinguished executive and family man.

2. As described below, Ms. Bonner filed a Complaint in the United States District Court for the Southern District of New York captioned as *Bonner v. Point72, et. Al.*, 18-cv-01233, alleging gender discrimination, retaliation and violations of federal and state equal pay laws. On their media tour promoting that lawsuit, Defendants thereafter published false and *per se* defamatory statements about Mr. Haynes in the media.

3. Indeed, Ms. Bonner went on national television and falsely claimed that Mr. Haynes sexually harassed female Point72 employees by writing the word “pussy” on a

whiteboard hanging in his glass office, where female employees were forced to work and participate in meetings for weeks.

4. Wigdor, in turn, republished videos of Ms. Bonner's false and *per se* defamatory statements on its websites, Twitter feed, and YouTube channels.

5. This defamation action is not based on the pleaded allegations contained in the Complaint filed by Defendants in the United States District Court for the Southern District of New York. Instead, it seeks to hold Defendants accountable for their actions and acts of defamation that were published outside of their court pleading in their media tours, press conferences and press releases, which are not protected by immunity or privilege. *See, e.g., GeigTech E. Bay LLC v. Lutron Elecs. Co.*, 18-cv-5290 (CM), 2019 WL 1768965, at \*5 (S.D.N.Y. Apr. 4, 2019); *Reszka v. Collins*, 136 A.D.3d 1299, 1300, 25 N.Y.S.2d 473 (4th Dep't 2016); *Volpe v. Panicioli*, 57 Misc.3d 1219(A), 72 N.Y.S.3d 519 (Sup., N.Y. Co. 2017); *Williams v. Williams*, 23 N.Y.2d 592, 298 N.Y.S.2d 473 (1969).

6. Defendants have caused lasting and profound harm to Mr. Haynes. He has suffered significant damage to his reputation, has been unable to secure gainful employment, and has suffered tremendous personal humiliation as a result of Ms. Bonner's false and *per se* defamatory statements and Wigdor's publication of them.

7. Defendants' smear campaign that targeted Mr. Haynes never should have begun, and it has lasted for far too long. Defendants should be required to remove their defamatory statements against Mr. Haynes from their websites and social media platforms, enjoined from further publishing them, and answer for the harm they have caused Mr. Haynes.

### PARTIES

8. Plaintiff is resident of the State of New York, County of Westchester.

9. Upon information and belief, defendant Lauren Bonner is a resident of the state of New York, County of Kings.

10. Upon information and belief, Wigdor LLP is a New York limited liability law firm partnership with its principal place of business located at 85 Fifth Avenue 5th Floor, New York, New York 10003.

### JURISDICTION AND VENUE

11. This Court has jurisdiction over Defendants pursuant to CPLR §§ 301 and 302(a) because Wigdor has its principal place of business in the State of New York and Ms. Bonner is a resident of the State of New York.

12. Venue is proper under CPLR §§ 503 and 501 because Wigdor has its principal place of business in the County of New York, and because the acts at issue took place in the County of New York.

### FACTS

#### Ms. Bonner's Employment with Point72

13. Point72 is a family office asset management firm launched by investor Steven Cohen in 2014 to manage his own funds and those of his charitable foundation.

14. Mr. Haynes joined Point72 in 2014 and became President later that year. Prior to joining Point72, Mr. Haynes was a Director at McKinsey & Company, an international consulting firm, for more than twenty (20) years.

15. Ms. Bonner is an Associate Director at Point72. She has been employed at Point72 since August 2016.

16. At no time, did Ms. Bonner report directly to Mr. Haynes.

**Ms. Bonner's Complaint Against Point72**

17. In early 2018, Ms. Bonner hired Wigdor to represent her in a gender discrimination, equal pay, and sexual harassment lawsuit filed against Point72 and some its officers, including Mr. Haynes. *See Bonner v. Point 72, et. al.*, 18-cv-01233 (United States District Court, Southern District of New York)(the "Complaint").<sup>1</sup>

18. Within hours of filing the Complaint, Wigdor partners Jeanne Christensen and Michael Willemin made statements to various news outlets regarding certain allegations asserted therein against Mr. Haynes.

19. On its website, Wigdor promotes and touts its coverage and connections with "leading local and national media, including the New York Times, The Wall Street Journal, Time, Bloomberg, Reuters, The Daily News and the major broadcast networks."

20. Upon information and belief, Ms. Bonner hired a media consulting company.

**Defendants' Media Blitz Against Mr. Haynes**

**The New Yorker Interview**

21. On or about May 3, 2018, Ms. Bonner gave an interview to Sheelah Kolhatkar with The New Yorker.

22. During her May 3, 2018 interview, Ms. Bonner stated that Mr. Haynes "left the word 'pussy' scrawled on a whiteboard in his glass-walled office for weeks, with no apparent explanation" and that "female employees [Ms. Bonner] spoke to had made note of the 'pussy'

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<sup>1</sup> Ultimately, the Court in that lawsuit ruled that Ms. Bonner was required to arbitrate her claims against her employer pursuant to an arbitration provisions contained in her employment agreement with Point72 (the "Point72 Arbitration"). There is no written agreement between Mr. Haynes and Ms. Bonner requiring arbitration of his defamation claims. Similarly, Mr. Haynes is not required to arbitrate his defamation claims against Wigdor.

written on Haynes's whiteboard, but that everyone was too uncomfortable to say anything about it."

23. These statements are false.

24. These statements are defamatory *per se*.

25. On May 4, 2018, Wigdor published a link of Ms. Bonner's May 3, 2018 interview with The New Yorker on its firm website.

#### **The CNBC Interview**

26. On June 11, 2018, Ms. Bonner was featured in an interview with CNBC journalist Leslie Picker.

27. During her June 11, 2018 interview, Ms. Bonner made the following statements about Mr. Haynes:

"I thought it was important to share some of these other stories that bring color -- to the environment, so people can understand what it's like to walk past the president's office or sit in his office while the word 'pussy' is written on the whiteboard above his head."

28. These statements are false.

29. These statements are defamatory *per se*.

30. On June 11, 2018, Wigdor published a video recording of Ms. Bonner's CNBC interview on its firm website and Twitter feed.

31. On June 13, 2018, Wigdor published a video recording of Ms. Bonner's CNBC interview on its YouTube channel.

#### **The CNN Interview**

32. On July 9, 2018, Ms. Bonner was featured in an interview with CNN's Chief International Correspondent, Christiane Amanpour.

33. During her July 9 interview, Ms. Bonner made the following statements about Mr.

Haynes:

“[T]he president’s office [] he had the word ‘pussy’ written up on his whiteboard. You sat there in meetings with the president and the word ‘pussy’ floating above him. His glass office so anyone can see it walking by, many people had meetings in that office, it went on for weeks and really no one – no one thought to tell him it was not okay.”

34. These statements are false.

35. These statements are defamatory *per se*.

36. On July 10, 2018, Ms. Bonner published a video of her CNN interview on her Twitter feed, where it remains.

37. On July 10, 2018, Wigdor republished a video of Ms. Bonner’s CNN interview on its YouTube channel, firm website, and Twitter feed.

**Ms. Bonner and Wigdor Refuse to Retract their *Per Se* Defamatory Statements**

38. On April 5, 2019, defense counsel in the Point72 Arbitration sent a letter to Wigdor requesting that it withdraw and remove all references to Ms. Bonner’s false statements about Mr. Haynes from Wigdor’s website, YouTube channel, and any other electronic or written publication.

39. Wigdor refused the request.

40. Upon information and belief, Wigdor knew that Ms. Bonner’s statements about Mr. Haynes were false when it refused to remove the postings from its website.

41. On June 18, 2019, Mr. Haynes’s personal counsel sent a letter to Wigdor and Ms. Bonner requesting that: (i) Ms. Bonner retract the false and *per se* defamatory statements that she made about Mr. Haynes during her interviews with various national news networks; and (ii) that Wigdor and Ms. Bonner remove all recordings and references to Ms. Bonner’s false and *per se*

defamatory statements about Mr. Haynes from their websites, Twitter feeds, and YouTube channels.

42. On June 20, 2019, Wigdor and Ms. Bonner again refused to retract their defamatory statements and posts about Mr. Haynes.

43. Upon information and belief, Wigdor and Ms. Bonner knew the statements about Mr. Haynes were false when they refused to retract them.

**Defendants' Defamatory Statements Have Devastated Mr. Haynes's Reputation and Have Caused Him to Suffer Substantial Harm and Damages**

44. Defendants' *per se* defamatory statements have caused significant harm and damages to Mr. Haynes.

45. Mr. Haynes had been continuously employed in senior executive positions for more than twenty years (20) until Ms. Bonner published her *per se* defamatory statements about him to the media.

46. Prior to joining Point 72, Mr. Haynes was a Director/Senior Partner at McKinsey & Company earning a substantial salary and benefits for his work.

47. As President of Point 72, Mr. Haynes earned a substantial salary and benefits for his work.

48. Mr. Haynes is currently unemployed and is actively seeking employment.

49. Mr. Haynes has been unable to find a job and has been told repeatedly that he is unemployable because of Ms. Bonner's false and defamatory claims against him.

50. Additionally, Mr. Haynes has also suffered nonpecuniary injuries. He has suffered significant injury to his reputation and has suffered tremendous personal humiliation and emotional distress.



**CAUSES OF ACTION****First Cause of Action**  
(Defamation *Per Se* Against Ms. Bonner)

51. Mr. Haynes hereby incorporates the allegations in paragraphs 1 through 50 of this Verified Complaint as if they were fully set forth herein.

52. As set forth above, Ms. Bonner published putative statements of fact about Mr. Haynes on July 9 and July 10, 2018, which falsely and maliciously accused him of committing certain acts of sexual harassment.

53. Specifically, on July 9, 2018, during her interview with CNN, Ms. Bonner stated that Mr. Haynes sexually harassed female point72 employees when he wrote the word “pussy” on a whiteboard hanging in his office, where female employees were forced to work and participate in meetings for weeks.

54. Ms. Bonner promoted and republished a video of her CNN interview on her Twitter feed on July 10, 2018.

55. The statements that Ms. Bonner made about Mr. Haynes in the CNN interview are false.

56. Upon information and belief, Ms. Bonner intentionally, knowingly and maliciously published the false statements about Mr. Haynes during her CNN interview.

57. Ms. Bonner’s statements are defamatory because they expose Mr. Haynes to public contempt, ridicule, aversion, disgrace, and/or induce an evil opinion of him in the minds of right-thinking persons.

58. Ms. Bonner’s false statements about Mr. Haynes to the media are not protected by any privilege and/or other defense.

59. The aforementioned defamatory statements that Ms. Bonner made about Mr. Haynes during her CNN interview have falsely tainted and permanently damaged Mr. Haynes's professional reputation and are defamatory *per se*.

60. Mr. Haynes has suffered and will continue to suffer irreparable, pecuniary, and non-pecuniary harm as a direct and proximate cause of Ms. Bonner's false and *per se* defamatory statements including, but not limited to, loss of income, impairment of reputation and standing in the community, personal humiliation, and mental anguish and suffering.

61. Ms. Bonner acted maliciously in disseminating, and then deliberately failing to remove hyperlinks and references to, false statements about Mr. Haynes with the malicious intent of causing maximum harm to him and his business and personal reputations for her own promotion, benefit and gain, and justifying an award of punitive damages in an amount to be determined by the trier-of-fact.

Second Cause of Action  
(Defamation *Per Se* Against Wigdor)

62. Mr. Haynes hereby incorporates the allegations in paragraphs 1 through 61 of this Verified Complaint as if they were fully set forth herein.

63. As set forth above, Wigdor published putative statements of fact about Mr. Haynes on July 10, 2018, which falsely and maliciously accused Mr. Haynes of committing certain acts of sexual harassment.

64. Specifically, on July 10, 2018, Wigdor published videos of Ms. Bonner's July 9, 2018 CNN interview, during which Ms. Bonner falsely stated that Mr. Haynes sexually harassed female Point72 employees when he wrote the word "pussy" on a whiteboard hanging in his office, where female employees were forced to work and participate in meetings for weeks, on (i) its website, (ii) its YouTube channel, and (iii) its Twitter feed.

65. The statements that Ms. Bonner made about Mr. Haynes in the CNN interview and that Wigdor published on its firm website, YouTube channel, and Twitter feed are false.

66. Upon information and belief, Wigdor intentionally, knowingly and maliciously published and promoted the false statements of fact that Ms. Bonner made about Mr. Haynes in the CNN interview.

67. The statements that Wigdor published about Mr. Haynes are defamatory because they expose Mr. Haynes to public contempt, ridicule, aversion, disgrace, and/or induce an evil opinion of him in the minds of right-thinking persons.

68. Wigdor's publications of false statements of fact about Mr. Haynes are not protected by any privilege and/or other defense.

69. Upon information and belief, the aforementioned defamatory statements that Ms. Bonner made about Mr. Haynes in her CNN interview and that Wigdor published have falsely tainted and permanently damaged Mr. Haynes's professional reputation and are defamatory *per se*.

70. Mr. Haynes has suffered and will continue to suffer irreparable, pecuniary, and non-pecuniary harm as a direct and proximate cause of Wigdor's publication of false and *per se* defamatory statements including, but not limited to, loss of income, impairment of reputation and standing in the community.

71. Wigdor acted maliciously in disseminating, and then deliberately failing to remove hyperlinks and references to, false statements about Mr. Haynes with the malicious intent of causing maximum harm to him and his business and personal reputations for its own promotion, benefit and gain, and justifying an award of punitive damages in an amount to be determined by the trier-of-fact.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that the Court enter judgment in his favor and against Defendants, jointly and severally, for the following relief:

- A. A declaratory judgment that Ms. Bonner's statements against Mr. Haynes are false;
- B. Equitable relief as the Court deems appropriate pursuant to applicable law including, but not limited to: (1) ordering that Defendants remove all false and defamatory statements about Mr. Haynes from any and all electronic mediums including, but not limited to, Defendants' websites, Twitter feeds, YouTube channels, and LinkedIn pages; (2) enjoining Defendants from further disseminating any false statements, reports, or press releases about Mr. Haynes on any medium including, but not limited to, Defendants' websites, Twitter feeds, YouTube channels, and LinkedIn pages; and (3) imposing any other reasonable restrictions on the future activities and conduct of Defendants with respect to their defamatory statements about Mr. Haynes;
- C. An award of damages against Defendants, in an amount to be determined at trial, plus interest, to compensate Plaintiff for all monetary and/or economic damages caused by Defendants' conduct;
- D. An award of damages against Defendants, in an amount to be determined at trial, plus interest, to compensate for all non-monetary and/or compensatory damages, including, but not limited to, compensation for Plaintiff's emotional distress;
- E. An award of punitive damages in an amount to be determined at trial;
- F. Prejudgment interest on all amounts due;
- G. An award of Plaintiff's reasonable attorneys' fees and costs; and,

H. Such other and further relief as the Court may deem just and proper.

**JURY DEMAND**

Plaintiff hereby demands a trial by jury on all issues of fact and damages stated herein.

Dated: June 28, 2019

New York, New York

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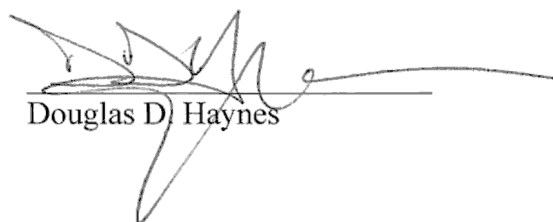
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*Attorneys for plaintiff Douglas D. Haynes*

VERIFICATION

I, Douglas D. Haynes, state under the penalties of perjury that I have read the Verified Complaint; that the allegations of fact contained therein are based on my personal knowledge or on information given to him by persons with personal knowledge thereof; that said allegations of fact are true to the best of my knowledge and belief; and that no material facts have been omitted therefrom.

Signed under the penalties of perjury this 28 day of June, 2019.

  
Douglas D. Haynes

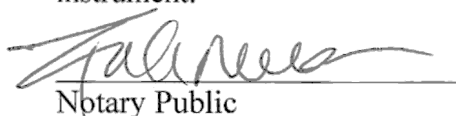
Sworn to before me this  
28th day of June, 2019

  
Notary Public

Frank Marchesano  
Notary Public State of New York  
Registration No.01MA5356802  
Qualified in Westchester  
Commission Expires April 3, 2021

**CERTIFICATE OF CONFORMITY**

On the 28th day of June, 2019, before me, the undersigned, personally appeared Douglas D. Haynes, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within Verification and acknowledged to me that he executed the same in his capacity, and that by his signature on the Verification, the individual executed the instrument.

  
Notary Public

Frank Marchesano  
Notary Public State of New York  
Registration No.01MA5356802  
Qualified in Westchester  
Commission Expires April 3, 2021